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**VIA ELECTRONIC FILING**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12th Street SW  
Washington DC 20554

**Re: Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114**

Dear Ms. Dortch:

On July 15, 2019, Mike Tan and the undersigned of AT&T, met with David Furth, Deputy Bureau Chief of the Public Safety and Homeland Security Deputy Bureau, about the above-referenced proceeding. We discussed, in the abstract, whether Z-axis solutions that would depend on user permissions on the handset to calibrate barometric pressure sensors could be compliant with the FCC's proposed vertical accuracy rules. Because these calibration processes would, by necessity, share detailed location information with a third party outside of the context of a 911 call, they would require user consent, such as by providing the user an option to enable/disable such processes. While such Z-axis solutions may produce vertical location results within the FCC's proposed 3-meter accuracy target when enabled, these solutions would very likely produce results outside this target if users declined permissions for these processes to operate. Accordingly, the Commission should consider whether these options for Z-axis solutions would be able to comply with the FCC's proposed vertical accuracy rules or whether the Commission should consider adopting a more flexible vertical accuracy requirement.

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced docket. Please do not hesitate to call me if you have questions.

Sincerely,

/s/ Joseph P. Marx  
Assistant Vice President, AT&T Services Inc.

Cc:  
David Furth